

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

COMMODITY FUTURES TRADING
COMMISSION,

Plaintiff,

-against-

STEPHEN WALSH, PAUL GREENWOOD,
WESTRIDGE CAPITAL MANAGEMENT, INC.,
WG TRADING INVESTORS, LP, WGIA, LLC,

Defendants,

WESTRIDGE CAPITAL MANAGEMENT
ENHANCEMENT FUNDS INC., WG TRADING
COMPANY LP, WGI LLC, K&L INVESTMENTS,
AND JANET WALSH,

Relief Defendants.

Civil Action No.: 09-CV-1749 (GBD)

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

-against-

WG TRADING INVESTORS, L.P., WG TRADING
COMPANY LIMITED PARTNERSHIP,
WESTRIDGE CAPITAL MANAGEMENT, INC.,
PAUL GREENWOOD, and STEPHEN WALSH

Defendants,

ROBIN GREENWOOD and JANET WALSH

Relief Defendants.

Civil Action No.: 09-CV-1750 (GBD)

NOTICE OF MOTION AND MOTION FOR ORDER APPROVING STIPULATIONS RE:

TAX CLAIMS AND AUTHORIZING RECEIVER TO PROCEED WITH THIRD

DISTRIBUTION ON ALLOWED INVESTOR CLAIMS IN THE MODIFIED AMOUNT OF

\$75,712,831

TO THE PARTIES HERETO, AND TO ALL CREDITORS AND OTHER INTERESTED PARTIES TO THE RECEIVERSHIP PROCEEDINGS:

COMES NOW Robb Evans & Associates LLC (the "Receiver"), the duly appointed receiver in the two above-referenced actions (the "Actions"), and hereby moves the Court for an order approving (1) the written Stipulation and Proposed Order between the Receiver and the Internal Revenue Service of the United States Department of the Treasury (the "Service" or the "Government") regarding pre-receivership tax claims, dated as of August 26, 2015 (the "Service Stipulation"), a true and correct copy of which is attached to the concurrently-filed declaration of Brick Kane ("Kane Declaration") as Exhibit 1, and (2) the written Stipulation and Proposed Order between the Receiver and the New York State Department of Taxation and Finance (the "Department") regarding pre-receivership tax claims, dated as of August 5, 2015 (the "Department Stipulation" and, together with the Service Stipulation, the "Stipulations"), a true and correct copy of which is attached to the Kane Declaration as Exhibit 2, and authorizing the Receiver to immediately proceed with the Third Distribution on allowed investor claims (previously approved by the Court in its November 19, 2013 Order Granting Motion for Order Approving Third Distribution on Allowed Investor Claims), in the modified amount of \$75,712,831.

The motion is made and based on the memorandum of points and authorities (the "Receiver's Brief") and Kane Declaration filed concurrently herewith, the Stipulations (the originals of which are also filed concurrently herewith), on the Receiver's reports in the above-captioned actions, on the orders and other pleadings and files of this Court referred to in the Receiver's Brief, of which the Receiver requests the Court take judicial notice pursuant to Rule 201 of the Federal Rules of Evidence, and on such other evidence and arguments as may be presented to the Court at the time of any hearing on this motion.

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PLEASE TAKE FURTHER NOTICE that the Court has not set a hearing on the motion. Pursuant to the Court's Local Rule 6.1(b), any opposing affidavits and answering memoranda must be filed within 14 days after service of this motion.

Dated: October 9, 2015
Los Angeles, California

Respectfully submitted,

/s/ Craig A. Welin

Craig A. Welin, Esq.
Admitted Pro Hac Vice in the United States District
Court-Southern District of New York
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-and-

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